

SCOPING/PUBLIC PARTICIPATION REPORT FOR ENVIRONMENTAL IMPACT STATEMENT ON RESIDENT CANADA GOOSE MANAGEMENT

June 16, 2000

Executive Summary - On August 19, 1999, the U.S. Fish and Wildlife Service, in cooperation with the Wildlife Services program of the United States Department of Agriculture, Animal and Plant Health Inspection Service, published a Notice of Intent to prepare an Environmental Impact Statement (EIS) on resident Canada goose management. This action was in response to the growing numbers of Canada geese that nest and reside predominantly within the conterminous United States and our desire to examine alternative strategies to control and manage resident Canada geese that either pose a threat to health and human safety or cause damage to personal and public property. Public comment was solicited on each of the six identified preliminary alternatives and other potential alternatives. A subsequent notice was published on December 30, 1999, identifying nine public scoping meeting locations at various sites across the United States. Public comments were accepted from the opening of the comment period on August 19, 1999, until March 30, 2000. In summary, over 1,250 people attended the public scoping sessions and over 3,000 submitted written comments, including approximately 1,500 electronic comments. Analysis of the comments were separated into seven major groups: private individuals, businesses, non-governmental groups (NGOs), local government agencies and associations, Federal agencies, State agencies, and Flyway Councils and Canadian interests.

Background

On August 19, 1999, the U.S. Fish and Wildlife Service, in cooperation with the Wildlife Services program of the United States Department of Agriculture, Animal and Plant Health Inspection Service, published a Notice of Intent to prepare an Environmental Impact Statement (EIS) on resident Canada goose management (64 FR 45269) (Attachment 1). This action was in response to the growing numbers of Canada geese that nest and reside predominantly within the conterminous United States and our desire to examine alternative strategies to control and manage resident Canada geese that either pose a threat to health and human safety or cause damage to personal and public property. The notice identified six preliminary alternatives:

A. No Action Alternative

Under the No Action Alternative, no additional regulatory methods or strategies would be authorized. We would continue the use of special hunting seasons, the issuance of depredation permits, and the issuance of special Canada goose permits. These permits would continue to be issued under existing regulations.

B. Increased Promotion of Non-lethal Control and Management

Under this alternative, we would actively promote the increased use of non-lethal management tools, such as habitat manipulation and management, harassment techniques, and trapping and relocation. While permits would continue to be issued under existing regulations, no additional regulatory methods or strategies would be introduced.

C. Nest and Egg Depredation Order

This alternative would provide a direct population control strategy for resident Canada goose breeding areas in the U.S. This alternative would establish a depredation order authorizing States

to implement a program allowing the take of nests and eggs to stabilize resident Canada goose populations without threatening their long-term health. Monitoring and evaluation programs are in place, or would be required, to estimate population sizes and prevent populations from falling below either the lower management thresholds established by Flyway Councils, or individual State population objectives. Since the goal of this alternative would be to stabilize breeding populations, not direct reduction, no appreciable reduction in the numbers of adult Canada geese would likely occur.

D. Depredation Order for Health and Human Safety

This alternative would establish a depredation order authorizing States to establish and implement a program allowing the take of resident Canada goose adults, goslings, nests and eggs from populations posing threats to health and human safety. The intent of this alternative is to significantly reduce or stabilize resident Canada goose populations at areas such as airports, water supply reservoirs, and other such areas, where there is a demonstrated threat to health and human safety, without threatening the population's long-term health. Monitoring and evaluation programs are in place, or would be required, to estimate population sizes and prevent populations from falling below either the lower management thresholds established by Flyway Councils, or individual State population objectives. Under this alternative, some appreciable localized reductions in the numbers of adult geese could occur.

E. Conservation Order

This alternative would authorize direct population control strategies such as nest and egg destruction, gosling and adult trapping and culling programs, or other general population reduction strategies on resident Canada goose populations in the U.S. This alternative would establish a conservation order authorizing States to develop and implement a program allowing the take of geese posing threats to health and human safety and damaging personal and public property. The intent of this alternative is to significantly reduce or stabilize resident Canada goose populations at areas where conflicts are occurring without threatening the long-term health of the overall population. Monitoring and evaluation programs are in place, or would be required, to estimate population sizes and prevent populations from falling below either the lower management thresholds established by Flyway Councils, or individual State population objectives. State breeding populations would be monitored annually each spring to determine the maximum allowable take under the conservation order. Under this alternative, some appreciable localized reductions in the numbers of adult geese would likely occur and lesser overall population reductions could occur.

F. General Depredation Order

This alternative would authorize direct population control strategies such as nest and egg destruction, gosling and adult trapping and culling programs, or other general population reduction strategies on resident Canada goose populations in the U.S. This alternative would establish a depredation order allowing any authorized person to take geese posing threats to health and human safety and damaging personal and public property. The intent of this alternative is to significantly reduce resident Canada goose populations in areas where conflicts

are occurring. Monitoring and evaluation programs are in place, or would be required, to estimate population sizes and prevent populations from falling below either the lower management thresholds established by Flyway Councils, or individual State population objectives. Under this alternative, some appreciable localized reductions in the numbers of adult geese would likely occur and lesser overall population reductions could occur.

In addition to describing the preliminary alternatives, the August 19 notice reiterated that the primary purpose of the scoping process was to determine which management alternatives for the control of resident Canada goose populations would be analyzed in the EIS. Public comment was solicited on each of the identified preliminary alternatives and other potential alternatives.

The notice also identified potentially affected resource areas and indicated that we would conduct an analysis of each area, by alternative, in the EIS. Resource areas identified included:

- (1) Resident Canada goose populations and their habitats
- (2) Human health and safety
- (3) Public and private property damage and conflicts
- (4) Sport hunting opportunities
- (5) Socioeconomic effects

Public comment was solicited on other potentially affected resource areas.

Public Scoping Meetings

A subsequent notice was published on December 30, 1999, identifying nine public scoping meeting locations (64 FR 73570) (Attachment 2). The nine public scoping meetings were held on the following dates at the indicated locations and times:

- February 8, 2000; Nashville, Tennessee, at the Ellington Agricultural Center, Ed Jones Auditorium, 440 Hogan Road, 7 p.m.
- February 9, 2000; Parsippany, New Jersey, at the Holiday Inn, 707 Route 46 East, 7 p.m.
- February 10, 2000; Danbury, Connecticut, at the Holiday Inn, 80 Newtown Road, 7 p.m.
- February 15, 2000; Palatine, Illinois, at the Holiday Inn Express, 1550 East Dundee Road, 7 p.m.
- February 17, 2000; Bellevue, Washington, at the DoubleTree Hotel, 300 - 112th Avenue S.E., 7 p.m.
- February 22, 2000; Bloomington, Minnesota, at the Minnesota Valley National Wildlife Refuge Visitors Center, 3815 East 80th Street, 7 p.m.
- February 23, 2000; Brookings, South Dakota, at South Dakota State University, Northern Plains Biostress Laboratory, Room 103, Junction of North Campus and Rotunda Lane, Brookings Inn, 2500 Sixth Street, 7 p.m.
- February 28, 2000; Richmond, Virginia, at the Virginia Department of Game and Inland Fisheries Headquarters, Board Room, 4000 West Broad Street, 7 p.m.
- March 1, 2000; Denver, Colorado, at the Colorado Department of Wildlife, Northeast

Region Service Center, Hunter Education Building, 6060 Broadway, 7 p.m.

At the scoping meetings, we accepted either oral and/or written comments. All who wished to present comments were permitted to do so. Over 1,250 people attended the nine public scoping sessions. A brief synopsis of each meeting follows.

Nashville, Tennessee

Approximately 45 people attended the Nashville meeting. Primary issues and concerns identified by participants were damages to private property, damages to golf courses, concerns over State management of goose habitat, and potential health hazards from geese. Participants expressed support for a general depredation order, a health and human safety depredation order, the use of harassment methods, habitat alteration and exclusion, the issuance of control permits to private companies, increased hunting, and no feeding ordinances.

Parsippany, New Jersey

Approximately 260 people attended the Parsippany meeting. Primary issues and concerns identified by participants were damages to public and private property, damages to agricultural crops, the fouling of sidewalks, lawns, and beaches, potential public health hazards from geese, water quality impacts, the current time-consuming and burdensome Federal permit process, the internal bias of the Fish and Wildlife Service and State game agencies toward lethal control methods, the effects of resident geese on migrant geese, the effects of resident geese on native wetland plant communities, the relative costs of each alternative, the abrogation of Federal authority and responsibility, the inadequacy of the proposed EIS, the costs of population monitoring, criteria for health and human safety, the costs of agricultural damage, and the administrative costs of each alternative.

Participants expressed support for egg addling, a general depredation order, a conservation order, the use of nonlethal harassment methods, “Alternative G” (a site-specific nonlethal control alternative offered by several groups), integrated comprehensive strategies, habitat alteration and exclusion, birth control, adequate funding and training of personnel to accomplish program goals, a depredation order for health and human safety, the issuance of control permits to private companies, the elimination of permits for control activities, increased funding for research, more liberal hunting seasons and hunting methods, hunting outside of traditional frameworks, the use of lead shot, giving maximum flexibility to individual States to address goose problems, relaxation of Federal oversight, the elimination of all lethal alternatives, the elimination of permit fees, allowing farmers to conduct control activities without a permit, reclassification of resident geese to “nonmigratory,” and requiring “no feeding” ordinances.

Danbury, Connecticut

Approximately 125 people attended the Danbury meeting. Primary issues and concerns identified by participants were damages to public and private property, damages to agricultural crops, the fouling of sidewalks, lawns, and beaches, potential public health hazards from geese, aesthetic impacts, impacts on public safety, aggressive behavior of birds, water quality impacts,

the current inefficient administrative Federal permit process, the effectiveness of hunting as a management tool, criteria for health and human safety, costs of agricultural damage, and appropriate damage criteria.

Participants expressed support for egg addling, a general depredation order, the use of nonlethal harassment methods, “Alternative G” (a site-specific nonlethal control alternative offered by several groups), integrated comprehensive strategies, use of reproductive controls, habitat alteration and exclusion, further education, more liberal hunting seasons and hunting methods, hunting outside of traditional frameworks, giving maximum flexibility to individual States to address goose problems, relaxation of Federal oversight, the elimination of all lethal alternatives, and requiring “no feeding” ordinances.

Palatine, Illinois

Approximately 320 people attended the Palatine meeting. Primary issues and concerns identified by participants were damages to public and private property, damages to agricultural crops, the fouling of sidewalks, lawns, potential public health hazards from geese, water quality impacts, the current time-consuming and burdensome Federal permit process, the internal bias of the Fish and Wildlife Service and the State game agencies toward lethal methods, the relationship of the resident goose population to storm water retention pond development, the impact of harassment methods on other waterfowl, and the costs of damages.

Participants expressed support for egg addling, the use of nonlethal harassment methods, “Alternative G” (a site-specific nonlethal control alternative offered by several groups), integrated comprehensive strategies, habitat alteration and exclusion, increased funding for public education and habitat alteration, the elimination of permits for control activities, more liberal hunting seasons and hunting methods, giving maximum flexibility to individual States to address goose problems, relaxation of Federal oversight, the elimination of all lethal alternatives, giving them to the homeless, streamlining the permit process, and requiring “no feeding” ordinances.

Bellevue, Washington

Approximately 100 people attended the Bellevue meeting. Primary issues and concerns identified by participants were damages to public and private property, the fouling of sidewalks, lawns, and beaches, potential public health hazards from geese, water quality impacts, airport safety, the relative costs of each alternative, and the illegal abrogation of Federal authority and responsibility. Participants expressed support for egg addling, a general depredation order, the use of nonlethal harassment methods, habitat alteration and exclusion, exploration of the commercial use of goose droppings, adequate funding to accomplish goals, increased funding for research, more liberal hunting seasons and hunting methods, hunting outside of traditional frameworks, the use of lead shot, giving maximum flexibility to individual local governments to address goose problems, the elimination of all lethal alternatives, and requiring “no feeding” ordinances.

Bloomington, Minnesota

Approximately 70 people attended the Bloomington meeting. Primary issues and concerns identified by participants were damages to public and private property, damages to agricultural crops, the fouling of sidewalks, lawns, and beaches, the relationship between wildlife restoration, hunting, and resident goose populations, the lack of scientific evidence to support health concerns, the use of inappropriate population data, and the current time-consuming and burdensome Federal permit process.

Participants expressed support for no action, egg addling, the use of nonlethal harassment methods, “Alternative G” (a site-specific nonlethal control alternative offered by several groups), the use of broad-based control to deal with site-specific concerns, an expansion of the Federal role and responsibilities, habitat alteration and exclusion, education, birth control, a depredation order for health and human safety, more liberal hunting seasons and hunting methods, hunting outside of traditional frameworks, giving maximum flexibility to individual States to address goose problems, and the elimination of all lethal alternatives.

Brookings, South Dakota

Approximately 190 people attended the Brookings meeting. Primary issues and concerns identified by participants were the definition of “resident” versus “migratory” populations, rural versus urban area problems and conflicts, damages to public and private property, damages to agricultural crops, potential health hazards from geese, hunter access to private land, airport safety, the lack of scientific evidence to support health concerns, and the current time-consuming and burdensome Federal permit process.

Participants expressed support for a general depredation order, a conservation order, financial compensation for agricultural damages, egg addling, the use of harassment methods, “Alternative G” (a site-specific nonlethal control alternative offered by several groups), habitat alteration and exclusion, education, more liberal hunting seasons and hunting methods, hunting outside of traditional frameworks, giving flexibility to State and local communities to address goose problems, and allowing farmers to conduct control activities.

Richmond, Virginia

Approximately 95 people attended the Richmond meeting. Primary issues and concerns identified by participants were damages to public and private property, damages to agricultural crops, the fouling of sidewalks, lawns, and beaches, water quality impacts, the internal bias of the Fish and Wildlife Service and Wildlife Services toward lethal methods, the lack of harvest pressure in urban areas, the lack of health and human safety evidence, and the creation of the “resident” goose problem by the Service and State agencies.

Participants expressed support for egg addling, a general depredation order, a conservation order, the use of nonlethal harassment methods, “Alternative G” (a site-specific nonlethal control alternative offered by several groups), a food-shelf program, habitat alteration and exclusion, trapping and relocation, increased research on nonlethal alternatives, more liberal hunting

seasons and hunting methods, hunting outside of traditional frameworks, giving maximum flexibility to individual States to address goose problems, commercial trapping and selling of birds (i.e., market hunting), the elimination of all lethal alternatives, and allowing farmers to conduct control activities.

Denver, Colorado

Approximately 45 people attended the Denver meeting. Primary issues and concerns identified by participants were damages to public and private property, damages to agricultural crops, the fouling of sidewalks and lawns, airport safety, the current time-consuming and burdensome Federal permit process, the need to look for regional solutions rather than local solutions, and clarification of Federal agency responsibilities under the MBTA. Participants expressed support for a general depredation order, birth control, financial compensation for damages, public education, more liberal hunting seasons and hunting methods, giving maximum flexibility to local communities to address goose problems, and requiring “no feeding” ordinances.

Written Comments

Public comments were accepted from the opening of the comment period on August 19, 1999, until March 30, 2000. Over 3,000 comments, including approximately 1,500 electronic comments, were received. Analysis of the comments were separated into seven major groups: private individuals, businesses, non-governmental groups (NGOs), local government agencies and associations, Federal agencies, State agencies, and Flyway Councils and Canadian interests.

Private individuals

We received 2,979 written comments from individuals that did not specifically identify representation of a group. Analysis indicated the vast majority of these comments could be broken down into 13 major categories. Numbers in parenthesis indicates the number of commenters.

- Support for Alternative A - No Action (4)
- Support for Alternative B - Increased Promotion of Nonlethal Control and Management (7)
- Support for Alternative C - Nest and Egg Depredation Order (6)
- Support for Alternative D - Depredation Order for Health and Human Safety (3)
- Support for Alternative E - Conservation Order (4)
- Support for Alternative F - General Depredation Order (725)
- Support for Alternative “G” (a site-specific nonlethal control alternative offered by several NGOs) (760)
- Support for nonlethal methods and egg addling (465)
- Support for only nonlethal methods (no egg addling) (533)
- Support for use of hunting or modification of existing seasons (159)
- Support for food shelf program (62)
- Support for “doing something” (67)

- Other (184)

Businesses

Issues identified by various businesses included impacts on water quality and water supplies, damages to property, the fouling of sidewalks and lawns, potential health hazards, contamination of athletic fields, agricultural damage, habitat degradation, increased soil erosion from denuded areas, economical and practical considerations of health and human safety management alternative, aircraft safety, automobile safety, pedestrian safety, curtailment of recreational use of impacted lands and waters, use of poor quality data, and the lack of data on potential health concerns.

Support was expressed for direct population reduction, relaxation of requirements for permits, a general depredation order, a depredation order for agricultural damage, more liberal hunting regulations and hunting outside traditional frameworks, net population reduction, government mandated removal of birds, Shipping the birds to other Federal areas or Canada, Alternative “G” (a site-specific nonlethal control alternative offered by several groups), elimination of the permit for egg addling, increased funding for research, and increased promotion of nonlethal methods.

NGOs

We divided comments from non-governmental organizations into those groups generally opposed to lethal means and those supporting lethal means as an alternative.

Issues identified by groups generally opposed to lethal means (i.e., supporting nonlethal techniques and solutions) included the definition of “resident” vs “migratory,” the percentages of “resident,” “migrant” and “nonmigrant” geese, the humaneness of alternatives, the effect of alternatives on nontargets (endangered species), the long-term effectiveness of alternatives, the public acceptance of alternatives, the aesthetic and cultural impact of alternatives on the human environment, criteria for the use of alternatives, a review of health issues surrounding goose droppings, that the Service was only going through the motions and will disregard comments, that the Service has already predetermined answers, that the Service lacks credibility and ignores data that support nonlethal control, the lack of real public health and safety issues, a faulty EIS process, consideration that hunting may be the cause of urban goose situation, better definition of “public health and safety,” inordinate influence by Wildlife Services and the Flyways, the need for more public input, detail about what is known about resident geese (i.e., abundance, distribution, behavior, ecology, etc.), base decisions on science, a discussion of methods and procedures under humane treatment, consideration of social relationships, definition of “property damage” with accuracy and fair evaluation, distinguishing between agricultural and urban/suburban damage, data on health and human safety impacts, clarification of goal to maximizing recreation or reducing human/goose conflicts, monitoring and evaluation of all approaches, guidance for nonlethal alternatives, discussion of the impact of addling along with logistics, determination of threats to human health and safety (except airports) under Alternative D, inappropriate authority passed to the States under Alternative E, further description and discussion of lethal methods under Alternative F, the mix of resident and arctic geese under

restoration programs, lack of evidence that hunting will reduce problem, indistinguishability of resident and migrant geese, and that these populations are a Service-created problem.

These groups expressed support for nonlethal methods (including exclusion techniques, scare devices, habitat modification, chemical repellents, immunocontraception, and capture and relocation, dogs), Alternative G, ceasing killing and starting relocating, egg addling, public education, community-based solutions, changes in the permitting process, a research alternative (behavior, ecology, habitat preference, population growth, etc.), the creation of public-private partnerships, ceasing goose “growing” programs, ceasing the use of food plots for geese.

Issues identified by groups generally supporting lethal means as alternatives included the fact that resident geese are important component of southern goose hunting, agricultural water quality concerns, the reduced aesthetic and recreational use of public lands, health concerns, the lack of remaining suitable relocation sites, and the ineffectiveness of the current permit-issuance system.

These groups expressed support for the use of hunting as a management tool, not turning over management to States, restrictions on where golf courses can be built, management as a Federal-State-private partnership, a general depredation order, the use of physically challenged hunters to hunt in urban areas, direct population control, allowing each State the opportunity to handle their own conflicts, less stringent permit requirements, a comprehensive strategy, increased hunting, the use of egg/nest destruction, allowing State agencies more management authority and flexibility, and the development of State management plans.

Local government agencies and associations

Issues identified by local government agencies included the economic impacts of control activities on equipment and labor costs, potential health hazards, damages to property, the fouling of sidewalks, lawns, recreational areas, and beaches, the harassment of volunteers and local officials by a vocal minority, privacy of permit information, potential impacts on water supply reservoirs, impacts on agricultural crops, safety issues, carrying capacities of urban areas, practicality of using hunting in urban areas, increased soil erosion, the aggressive behavior of geese, the ineffectiveness of nonlethal approaches, and the increased risks to airports from hazing techniques.

They expressed support for increased hunting (including increases in bag limits and season length), a general depredation order, food bank programs, a more efficient and less cumbersome permit process, a reproductive inhibitor, proactive management, multi-faceted resolution, humane solutions, assistance from the Service to develop and implement strategies, egg addling, a conservation order, increased natural predators, public education, habitat modification, no feeding ordinances, financial assistance for urban areas, increased research, coordinated regional and national approach, and more management flexibility for States and local authorities.

State agencies

Comments received by State wildlife, natural resource, agricultural, and conservation agencies

were divided into representative Flyways in order to identify any Flyway-specific issues or alternatives.

Issues identified by State agencies in the Atlantic Flyway the discouragement of public recreational use, the closing of public swimming areas due to health concerns, costs of cleanup and maintenance, the aggressive behavior of geese, agricultural damage, effects of geese on water quality and wetland habitats, impacts on aesthetic values of property, effects of redistributing birds versus population reduction, and the relative costs of each alternative, the burdensome, time-consuming permit process, definition of “threats to health and human safety,” problems due to population distribution rather than the total population, and the protection of migrant geese .

Atlantic Flyway State agencies expressed support for aggressive alternatives based on health, welfare, and public safety, authority allowing the lethal removal of birds at public parks, beaches, and recreational areas year-round, the extension of hunting seasons, more available depredation permits, a general depredation order, less burdensome regulations, more State authority in harvest management, education, a conservation order, use of non-traditional hunting methods outside Treaty frameworks, an alternative similar to Alternative C allowing the limited (e.g., 2/day, 20/year) take of geese for health and human safety, damage, or nuisance reasons to enhance harassment methods, allowing individuals to destroy nests and eggs, the elimination of burdensome paperwork (applications, record-keeping, reporting), the maximization of special seasons, and a variety of available options.

Several Atlantic Flyway State agencies opposed any alternative that relied on the use of breeding population estimates and goals as strict thresholds for determining the use of an alternative or determining the allowable take under any alternative. They believed that periodic assessment on the program’s impact would ensure compatibility with long-term conservation and that the use of population estimates and goals are meant to reflect optimum numbers of geese, not minimum numbers, and further, that conflicts can occur even when goose numbers are below objectives.

Issues identified by State agencies in the Mississippi Flyway included problems due to population distribution rather than the total population, the utility of oral contraception, the definition of “properly dispose,” and a better understanding of population dynamics and migration.

Mississippi Flyway State agencies expressed support for preferring nonlethal means but needing lethal control in some instances, authority for individuals to destroy nests and eggs, requiring State agency oversight, maintaining sport harvest as the primary tool to manage populations, habitat manipulation, a conservation order, a general depredation order for human safety concerns, the use of regional population goals and objectives rather than State-specific population goals, a greater range of available options, use of non-traditional hunting methods outside Treaty frameworks, increased Federal role in on-the-ground support for goose management, requiring record-keeping, reporting, and population monitoring under all alternatives, and restricting lethal management actions to March 11 to August 31.

Issues identified by State agencies in the Central Flyway included the magnification of conflicts during the fall and winter when migrants arrive, agricultural impacts, problems due to population distribution rather than the total population, and a clarification of Wildlife Services' role and responsibility in dealing with goose complaints.

Central Flyway State agencies expressed support for a greater range of available options, maintaining sport harvest as the primary tool to manage populations, management assistance from the Service, and the use of non-traditional hunting methods inside or outside Treaty frameworks.

Issues identified by State agencies in the Pacific Flyway included water quality degradation and impacts.

Pacific Flyway State agencies expressed support for habitat alteration.

Federal agencies

The Wildlife Services program of the United States Department of Agriculture, Animal and Plant Health Inspection Service (WS), a cooperative agency on the preparation of the EIS, provided extensive comments on several areas in the EIS. In the "Purpose and Need for Action" section, WS provided information on increasing conflicts between geese and people in the Pacific Flyway and increasing concerns over potential water quality impacts in the Northeast and Midwest. WS believed discussion should include economic resources (property), human safety, human health, and natural resources. In the "Affected Environment" section, WS requested a thorough discussion of the history of resident goose populations and their migration patterns. Under "Control Methods Used Under each Alternative," WS wants the various lethal and nonlethal management methods and their relative effectiveness discussed. WS also requested a discussion of authorities and roles of the various management agencies.

Specific to the identified alternatives, WS requested a discussion of the costs and administrative burden that must be assumed by each agency and public and further details on each of the alternatives. WS also identified socioeconomic issues such as animal welfare, humaneness, animal rights, and animal aesthetic values. Lastly, WS requested a discussion of cumulative and indirect impacts and monitoring.

Flyway Councils and Canadian Interests

The Canadian Wildlife Service reminded the Service that all Canada geese are protected under the Migratory Birds Convention. Further, it is important that any measures discussed for dealing with resident Canada geese meet the criteria of Article VII of the Convention. More specifically, the CWS stressed continued protection of eastern subarctic nesting Canada geese, increased efforts to distinguish among the different Canada goose populations in the gathering of information and implementation of any regulations on wintering grounds where migratory populations exist, the conducting of control activities (other than local nest disruption) outside normal migration and wintering periods on more northerly-nesting Canada goose populations,

and solid information on goose population distribution during the migration and wintering periods.

Three of the four Flyway Councils provided comments. Generally, the Atlantic Flyway Council believed that population reduction is necessary to address the many conflicts associated with resident Canada geese and supported deregulation of “minor” activities such as egg addling and limited depredation permits. Further, the Council supported the maximization of hunting opportunities and that specific conditions should be included in any alternative to ensure that migrant populations were not affected.

Specific to the identified alternatives, the Atlantic Flyway Council believed that Alternative B should only include those activities that are unregulated (i.e., not trapping and relocation). The Council further believed that Alternative C should allow for the complete deregulation of nest and egg destruction, and that a similar alternative allowing the limited (e.g., 2/day, 20/year) take of geese for health and human safety, damage, or nuisance reasons to enhance harassment methods should be included in the EIS. Under Alternative D, the Council supported allowing any individual to take unlimited numbers of geese posing a threat to health and human safety as long as a clear definition of “threat to human health and safety” was established. However, the Council did not support inclusion of either Alternative C or D because they merely shifted authority to the States rather than to affected individuals, and thus required States to establish costly and burdensome regulatory programs. The Council believed that any conservation order alternative should allow additional sport harvest outside of Treaty limitations (March 11 to August 31) and liberalize the allowable hunting methods at these times. The Council’s preferred alternative was the general depredation order since it allowed the greatest relaxation of Federal oversight. However, the Council opposed any alternative that relied on the use of breeding population estimates and goals as strict thresholds for determining the use of an alternative or determining the allowable take under any alternative. The Council believed that periodic assessment on the program’s impact would ensure compatibility with long-term conservation and that the use of population estimates and goals are meant to reflect optimum numbers of geese, not minimum numbers, and further, that conflicts can occur even when goose numbers are below objectives. Lastly, the Council identified several issues for inclusion in the EIS analysis: effects of geese on water quality and wetland habitats, impacts on aesthetic values of property, effects of redistributing birds versus population reduction, and the relative costs of each alternative.

The Central Flyway Council expressed support for any alternative that would provide States the maximum management flexibility to address resident populations at both local and statewide scales. Further, the Council objected to the use of monitoring and evaluation as the singular criterion for determining when management actions could be applied. The Council reiterated that most conflicts in the Central Flyway occur as a result of goose distribution problems and that States need additional tools and flexibility to address these site-specific conflicts, which may have no effect on the statewide population. The Council also stressed the importance of considering increasing hunting opportunities outside the traditional frameworks. Lastly, the Council requested clarification of Wildlife Services’ role and responsibility in dealing with goose

complaints.

The Pacific Flyway Council recommended the development of a more conservative alternative to cover the full range of available options. The Council also identified several issues, including the contribution of resident geese to fall harvest in southern areas, the economic and programmatic effect of authorizing control actions, the definition of resident geese, the timing of control activities, and the recognition of regional differences in resident goose problems and effects of potential alternatives.

List of Canadian Interests, Flyway Councils, Federal Agencies, State Agencies, Local Governments and Associations, Non-governmental Organizations, and Businesses Providing Scoping Comments

Canadian Wildlife Service

Department of the Army, Corps of Engineers, Baltimore
Federal Aviation Administration, New England Region
Peterson Air Force Base, Colorado
United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services

Atlantic Flyway Council
Central Flyway Council
Pacific Flyway Council

Colorado Division of Wildlife
Illinois Department of Natural Resources
Indiana Department of Natural Resources
Maryland Department of Natural Resources
Michigan Department of Natural Resources
Minnesota Department of Natural Resources
Missouri Department of Conservation
Nebraska Game and Parks Commission
New Jersey Department of Agriculture
New Jersey Department of Environmental Protection
New Jersey Division of Fish and Wildlife
New Jersey State Park Service
New York Division of Fish, Wildlife and Marine Resources
North Dakota Game and Fish Department
Ohio Department of Natural Resources
Pennsylvania Game Commission
South Dakota Department of Game, Fish and Parks
Vermont Agency of Natural Resources
Virginia Department of Agriculture and Consumer Services
Virginia Department of Game and Inland Fisheries
Washington Department of Ecology

West Virginia Division of Natural Resources
Wisconsin Department of Natural Resources

Apple Valley Parks and Recreation Department, MN
Arlington Heights Park District, IL
Borough of Avon by the Sea, NJ
Bellevue Parks and Community Services Department, Bellevue, WA
Berkeley Township, NJ
Bollingbrook Park District, IL
Brick, NJ
Bristol Water Department, CT
Bucks Conservation District, New Britain, PA
Buffalo Grove Park District, IL
Burlington County Board of Agriculture, NJ
Camden, ME
Candlewick Lake Association, Poplar Grove, IL
Canton Board of Park Commissioners, Canton, OH
Cherbourg Homeowners Association, Libertyville, IL
Citation Lake Homeowners Association, IL
Dover, NJ
Dover Township Board of Health, NJ
Dover Township Environmental Commission, NJ
DuPage Environmental Commission, IL
Eden Prairie, MN
Elm Grove, WI
Emerald Green Property Owners Association, Inc, Rock Hill, NY
Fairway Mews Community Association, Spring Lake Heights, NJ
Gloucester County Planning Department, NJ
Hartford/Bloomfield Connecticut Health District, CT
Highland Park Park District, IL
Hoffman Estates Park District, IL
Horicon Police Department, Horicon, WI
Town of Hunts Point, WA
James River Park System, Richmond, VA
Lacey, WA
Lake County Board, IL
City of Lakewood Parks, Lakewood, CO
Lake Intervale Management Association, Parsippany, NJ
Lake Parsippany Property Owners Association, Parsippany, NJ
Lake Tansi Property Owners Association, Crossville, TN
Lewis County Department of Community Services, WA
Marple Environmental Advisory Board, PA
Manmouth County Park Board of Commissioners, NJ
Manmouth County Water Resources Commission, NJ
Minneapolis Park and Recreation Board, MN
Morris Township Health Department, NJ
New Jersey Senator Joseph Kyrollos Jr.

Northbrook Park District, IL
North Penn Water Authority
Ocean County Board of Health, NJ
Packanack Lack Country Club and Community Association, NJ
Pennsylvania House of Representatives, Paul Clymer
Pennsylvania House of Representatives, Thomas Corrigan
Pennsylvania House of Representatives, Gene DiGirolamo
Pennsylvania House of Representatives, Charles McIlhinney
Pennsylvania House of Representatives, David Steil
Pennsylvania House of Representatives, Mathew Wright
Pennsylvania State University Cooperative Extension, Bucks County, PA
Redmond Parks and Recreation Department, WA
Regent Park Property Owners Association, IL
City of Renton Parks, WA
Salt Creek Rural Park District, IL
Schaumburg Park District, IL
Seattle Department of Parks and Recreation, WA
Shadow Lake Village Condominium Association, Inc., NJ
Sikorsky Memorial Airport, Bridgeport, CT
City of Sioux Falls, SD
Sioux Falls Parks and Recreation, SD
Streamwood Park District, IL
Sussex County Board of Agriculture, NJ
Thiensville, WI
Trumbull, CT
Tukwila Parks and Recreation Department, Tukwila, WA
Upper Schuylkill Valley Park, PA
U.S. House of Representatives, James Greenwood, 8th District, PA
Warren County Parks, OH
Waukesha County Department of Parks and Land Use, WI
West Bend Park, Recreation & Forestry Department
West Long Branch Governing Body and Environmental Commission, NJ
Wheaton Park District, IL
Woodland Community Association, VA
Wyndam Manor Homeowners Association, Northbrook, IL

Alabama Waterfowl Association Inc.
Animal Protection Institute
Anti-vivisection Society of America
Association of Lakes of Putnam County
Bloomington Republican Club
Brookings Wildlife Federation
Buck's County Farm Bureau
Capable Partners
Churchill Nature Center
Citizens for the Preservation of Wildlife, Inc.
Coalition to Prevent the Destruction of Canada Geese

Coalition to Protect Canada Geese
Committee to Abolish Sport Hunting
Committee to Save our Wetlands
Connecticut Association of Golf Course Supervisors
Connecticut Farm Bureau Association
Connecticut Harbor Management Association
Delaware Action for Animals Inc.
Delaware Riverkeeper Network
Doris Day Animal League
Ducks Unlimited
Federated Humane Society of Pennsylvania
Friends of Animals
Friends of the Ducks and Geese
Friends of Waterfowl at Covell Lake, SD
Fund for Animals
Geese Peace
Golf Course Superintendents Association of Colorado
Grain Forage Producers Association of New Jersey
Honor and Nonviolence for Animals
Housatonic Fish & Game
Humane Society of the United States
Illinois Farm Bureau
LCS Chapter of Waterfowl U.S.A.
Manmouth County SPCA
Maryland/Deleware (The Wildlife Society)
Megunticook Watershed Association
Middle Tennessee Golf Course Superintendents Association
Minnesota Duck and Goose Callers Association
Minnesota Waterfowl Association
National Humane Education Society
National Rifle Association
National Wildlife Control Operators
New Jersey Animal Rights Alliance
New Jersey Farm Bureau
North American Waterfowl Federation
Pennsylvania Farm Bureau
Pennsylvania State Grange
Peoria Humane Society
Prairie Woods Audubon Society
Progressive Animal Welfare Society
Sun City Friends of Animals Inc.
Supporting and Promoting Ethics in the Animal Kingdom
United Sportsmen for South Dakotans
Virginia Soybean Association
We Citizens of Wisconsin
Wildlife Foundation
Wildlife Preserves Inc.

Wildlife Rehabilitation and Rescue Center

A & R Bionomics, WA
Alternatives Research and Development Foundation, Eden Prairie, MN
The Boeing Company, Seattle, WA
Consumers Maine Water Company, Rockport, ME
Critter Control, Inc., Traverse City, MI
Environmental Aquatic Management, IL
Furman Foods Inc., Northumberland, PA
Federal Business Centers, Edison, NJ
Fisher Mills, Inc., Seattle, WA
Giusto Farms, Portland, OR
Geese Police, IL
Geese Relief, CT
Goose Control Technology, NJ
Great Blue, Inc., Newton, NJ
Holidays' Crooked Creek Farm, Inc., North Springfield, PA
Kingsmill Resort, Williamsburg, VA
Lyn Lee Farms, State College, PA
Masonic Memorial Lodge, CO
Migratory Bird Management, Inc.
Mitch Cox Construction, Inc., Johnson City, TN
The Morton Arboretum, Lisle, IL
Mountain Lakes Management Committee, Mountain Lakes, NJ
Omni Environmental Corporation, Princeton, NJ
PACE Wildlife Solutions, CT
Palwaukee Municipal Airport, IL
Peace Valley Nature Center, PA
Philadelphia Suburban Water Company
Porters' Northern Illinois Goose Hunting Club, IL
Rainbow Lakes Community Club, Parsippany Lakes, NJ
Rob Roy Country Club Village, Prospect Heights, IL
Rumson - Fair Haven Regional Hospital, Rumson, NJ
Saddle Creek Golf Club, Lewisburg, TN
Scandinavian Design, Inc., New York, NY
Sioux Falls Regional Airport Authority, SD
Smithereen Company, Northlake, IL
Stillwater Gun Club, CO
Trinity International University, Deerfield, IL
West Point Country Club, West Point, VA
Wildlife Solutions, Chattanooga, TN
Wind Meadows Corp, Racine, WI